

Exhibit D

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ABN AMRO MORTGAGE GROUP, INC.,

Plaintiff,

*- against -*

NATIONAL SETTLEMENT AGENCY, INC.,  
STEVEN M. LEFF, RACHEL M. LEFF AND  
RICHARD A. LEFF,

Defendants.

Case No. 07-CIV-7657

**(PROPOSED) SUPPLEMENTAL  
DISCLOSURE ORDER  
AS AGAINST DEFENDANTS  
STEVEN M. LEFF AND  
NATIONAL SETTLEMENT  
AGENCY, INC.**

Upon the Supplemental Order to Show Cause of Plaintiff ABN AMRO Mortgage Group Inc. (“AAMG”) dated September \_\_\_, 2007, the Declaration of Thomas J. Kavaler dated September 21, 2007, the Further Declaration of Thomas J. Kavaler dated September 23, 2007 (the “Further Declaration”), the Memorandum of Law in support of said Order to Show Cause dated September 21, 2007 and the Second Memorandum of Law in support of said Order to Show Cause dated September 23, 2007, and due deliberation being had thereon;

And Plaintiff having filed an Amended Complaint on September 14, 2007, and having filed the Supplemental Order to Show Cause on September \_\_\_, 2007 requiring Defendants National Settlement Agency, Inc. (“NSA”) and Steven M. Leff (collectively, “Defendants”) to show cause why an order should not issue:

(a) ordering Defendant Steven M. Leff to provide counsel to Plaintiff AAMG with an affidavit, sworn by him, listing every bank account, brokerage account, or other investment account, held by Steven M. Leff or NSA (i.e., all accounts in the

name of Steven M. Leff or NSA, held in trust by or for Steven M. Leff or NSA, and any accounts in which Steven M. Leff or NSA has had an interest) in the last two years,

(b) ordering Defendant Steven M. Leff to provide counsel to Plaintiff AAMG with an affidavit, sworn by him, listing every stock or other business or investment interest held by Defendant Steven M. Leff or NSA (i.e., all interests held directly or indirectly, personally or in trust) in the last two years, other than those interests held via the accounts listed in accordance with section (a) of this order,

(c) ordering Defendant Steven M. Leff to provide counsel to Plaintiff AAMG with the registration and location information for his car and motorcycle described in a purported affidavit of Steven M. Leff sent by facsimile by his counsel to Plaintiff's counsel (the "Prior Leff Affidavit") so that they may be attached forthwith and,

(d) ordering the imprisonment of Defendant Steven M. Leff until such time as he complies with this order.

And plaintiff having filed a Summons and Complaint on August 28, 2007, and having filed the Order to Show Cause on August 28, 2007 requiring defendants National Settlement Agency, Inc. ("NSA"), Steven M. Leff, and Rachel M. Leff (collectively, "Defendants") to show cause why: (1) an order of attachment pursuant to Fed. R. Civ. P. 64 and C.P.L.R. Article 62, and (2) a preliminary injunction pursuant to Fed. R. Civ. P. 65 should not be entered;

And plaintiff having filed an undertaking in the sum of \$10,000 pursuant to the Order to Show Cause;

And Plaintiff AAMG and Defendants \_\_\_\_\_ having appeared before this Court on September \_\_\_\_\_, 2007;

And the Court having previously, pursuant to its Order of September 10, 2007, determined that, pursuant to Fed. R. Civ. P. 64 and C.P.L.R. §§ 6201(3) and 6212: (a) plaintiff has causes of action whereby it has demanded and would be entitled to a money

judgment against the named defendants in the amount of \$2,261,744.10, plus interest, costs, disbursements, and fees; (b) it is probable that the plaintiff will succeed on the merits of its claims against Defendants; (c) Defendants, with intent to defraud the plaintiff or frustrate the enforcement of a judgment that might be rendered in the plaintiff's favor, have assigned, disposed of, and secreted property, and are about to continue such acts; and (d) the amount demanded from Defendants exceeds all counterclaims known to the plaintiff; it is hereby

ORDERED that, the application for an Order holding Defendants Steven M. Leff and NSA in contempt of the Order of Attachment is GRANTED; and it is further

ORDERED that, pursuant to Fed. R. Civ. P. 64 and C.P.L.R. § 6220, Defendants Steven M. Leff and NSA shall FORTHWITH provide counsel to Plaintiff with (a) a sworn affidavit listing every bank account, brokerage account, or other investment account, held by Defendant Steven M. Leff or NSA in the last two years, and (b) a sworn affidavit listing every stock or other business or investment interest held by Defendant Steven M. Leff or NSA in the last two years, other than those interests held via the accounts listed in accordance with section (a) of this order, and (c) the registration and location information for his car and motorcycle described in the Prior Leff Affidavit so that they may be attached forthwith, and it is further,

ORDERED that those Defendants will be summarily held in contempt of this Order if they do not provide counsel to Plaintiff with the materials described above FORTHWITH, and it is further

ORDERED that, to purge themselves of such contempt, those Defendants shall FORTHWITH provide the materials described above to Plaintiffs and their counsel; and it is further



ORDERED that, being held in contempt for failure to comply with this Order, Defendant Steven M. Leff is ordered confined at a suitable place until such time as he shall provide the Affidavit of Assets as required by the Order of Attachment to Plaintiff and its counsel; a warrant for his arrest shall issue immediately.

Dated: New York, New York  
September \_\_\_\_, 2007

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United States District Judge